

JONATHAN O. PENA, ESQ.
CA Bar ID No. 278044
Peña & Bromberg, PLC
2440 Tulare St., Suite 320
Fresno, CA 93721
Telephone: 559-412-5390
Fax: 866-282-6709
info@jonathanpena.com
Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

Larese Marie Johnson Armstrong,)	Case No. 1:21-cv-00341-BAM
Plaintiff,)	STIPULATION AND ORDER FOR
vs.)	SECOND EXTENSION OF TIME
Kilolo Kijakazi, Acting)	
Commissioner of Social Security,)	
Defendant.)	

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 45-day extension of time, from February 22, 2022 to April 8, 2022, for Plaintiff to serve on defendant with PLAINTIFF'S OPENING BRIEF. Defendant will file Opposition brief on May 9, 2022, and Plaintiff's Reply will be filed May 24, 2022.

This is Plaintiff's second request for an extension of time. Good cause exists for this extension. For the weeks of February 14, 2022 and February 21,

2022, Counsel for Plaintiff has 16 merit briefs, and several letter briefs and reply briefs. Counsel also has 12 administrative hearings before the Office of Hearings Operations. For the month of March 2022, Counsel has over 22 merit briefs, in addition to reply briefs, and EAJA motions. Lastly, another attorney with the firm, Ms. Dolly Trompeter, is currently out of state due to her father's medical condition and as a result, the undersigned has taken on additional matters compounding the need for an extension.

Counsel for the Plaintiff does not intend to further delay this matter. Defendant does not oppose the requested extension. Counsel apologizes to the Defendant and Court for any inconvenience this may cause.

Respectfully submitted,

Dated: February 8, 2022

PENA & BROMBERG, ATTORNEYS AT LAW

By: /s/ Jonathan Omar Pena
JONATHAN OMAR PENA
Attorneys for Plaintiff

Dated: February 8, 2022

PHILLIP A. TALBERT
United States Attorney
LISA A. THOMAS
Regional Chief Counsel, Region VII
Social Security Administration

By: */s/ Sarah E. Preston
Sarah E. Preston
Special Assistant United States Attorney
Attorneys for Defendant
(*As authorized by email on February 8, 2022)

ORDER

Based upon the stipulation of the parties, and for cause shown, IT IS HEREBY ORDERED, that Plaintiff shall have an extension of time, to and include April 8, 2022, in which to file Plaintiff's Opening Brief; and that all other deadlines set forth in the Court's Scheduling Order (Doc. 5) shall be extended accordingly.

IT IS SO ORDERED.

Dated: February 9, 2022

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE